

APPENDIX A

Before the:

**WORLD INTELLECTUAL PROPERTY ORGANIZATION
ARBITRATION AND MEDIATION CENTER**

**La Société des Bains de Mer et du
cercle des étrangers à Monaco,
Place du Casino, Monte Carlo, MC
98000 Monaco, Principauté de Monaco**

(Complainant)

-v-

**Lucan Toh and Max Wright
46 Berkeley Square
London, London W1J 5AT
United Kingdom**

(Respondents)

Disputed Domain Names:

**grandmonaco.com
casinograndmonaco.com
grandmonacocasino.com
deutschesgrandmonaco.com
grandmonacoayda.com
grandmonacoayuda.com
grandmonacobingo.com
grand-monaco.com
grand-monaco-casino.com
grand-monaco-poker.com
grandmonacocasinoclub.com
grandmonacoclub.com
grandmonacocraps.com
grandmonacogames.com
grandmonacogaming.com
grandmonacohost.com
grandmonacohosts.com
grandmonacolottery.com
grandmonacolotto.com
grandmonacolounge.com
grandmonacomahjong.com
grandmonacomillions.com
grandmonaconews.com
grandmonacoonlinecasino.com
grandmonacoonlinegaming.com
grandmonacoonlinepoker.com
grandmonacopartners.com
grandmonacoplayersclub.com
grandmonacopoker.com**

Paragraph 6 of the Rules and Paragraph 7 of the Supplemental Rules: François Dessemontet, Dawn Osborne and Christophe Caron.

VIII. Mutual Jurisdiction

(Rules, para. 3(b)(xiii))

[14.] In accordance with Paragraph 3(b)(xiii) of the Rules, the Complainant will submit, with respect to any challenges that may be made by the Respondents to a decision by the Administrative Panel to transfer or cancel the domain names that are the subject of this Complaint, to the jurisdiction of the courts of the United States of America, where the Registrar is located.

IX. Other Legal Proceedings

(Rules, para. 3(b)(xi))

[15.] The disputed domain names are not currently subject to any other legal proceedings.

X. Communications

(Rules, paras. 2(b), 3(b)(xii); Supplemental Rules, paras. 3, 4)

[16.] A copy of this amended Complaint, together with the cover sheet as prescribed by the Supplemental Rules, has been sent or transmitted to M. Lucan Toh and Max Wright on by email (calan.horsman@playshare.com) and a hardcopy version of the Complaint and annexes have been sent by courier service.

[17.] A copy of this amended Complaint has been sent or transmitted to the concerned registrar on March 21, 2007 by fax to Laurie Anderson (+1 480 505 8844) and a hardcopy of the Complaint and annexes was sent by mail.

[18.] This amended Complaint is submitted to the Center in electronic form, and in four (4) hardcopy sets together with the original.